



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7**

11201 Renner Boulevard  
Lenexa, Kansas 66219

**OCT 12 2016**

**CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

Article Number: 7014 1200 0000 6126 5025

Mr. Scott Cadwallader  
President  
J&A Printing, Inc.  
1155 Sherman Road  
Hiawatha, Iowa 52233

RE: J&A Printing, Inc.  
Hiawatha, Iowa  
RCRA ID No.: IAR000006726

Dear Mr. Cadwallader:

**Request for Information**

On May 18, 2016, a representative of the U.S. Environmental Protection Agency inspected your facility. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act.

My staff has reviewed the inspection report, and your responses to the Notice of Preliminary Findings left with you during the inspection. Based on our reviews of these documents, we have determined that violations of RCRA were documented. We are requesting additional information regarding your facility's compliance status. Enclosed is a list of questions and/or requested information, and instructions to be used in providing your response. Please carefully read and follow these instructions. Your response to this request in accordance with the instructions is required by Section 3007 of RCRA and substantial penalties may result from not complying. Please note that the EPA reserves its right to pursue appropriate enforcement actions, including penalties for violations discovered as a result of the inspection, regardless of whether the violations were subsequently corrected.



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Within 30 calendar days of receiving this letter, please mail your response to: Rebecca Wenner, U. S. Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions to Rebecca Wenner, of my staff, at (913) 551-7644.

Sincerely,



Mary Goetz  
Chief

Waste Enforcement and Materials Management  
Branch  
Air and Waste Management Division

Enclosures

cc: Amie Davidson, Supervisor, Contaminated Sites Section  
Iowa Department of Natural Resources

List of Requested Information  
J&A PRINTING, INC.  
Hiawatha, Iowa  
RCRA ID No.: IAR000006726

1. Please identify all persons responding to the questions in this letter. Please include names, titles, and telephone numbers, if different from the facility's telephone number.
2. The analytical results provided for the solvent-contaminated wipes adequately demonstrate that the wipes are not a characteristic hazardous waste for metals and volatile organic compounds. However, they do not demonstrate whether the wipes are an ignitable hazardous waste. Please provide the following:
  - a. Analytical results or other documentation that shows whether or not the solvent contaminated wipes are characteristic for ignitability; and
  - b. If you intend to manage your solvent-contaminated wipes under the solvent-contaminated wipe exclusion, please explain how they are or will be managed to meet the conditions of the exclusion.
3. During the May 18, 2016, inspection, you provided a copy of uniform hazardous waste manifest 003091224 which documents the last shipment of hazardous waste preceding the inspection, on March 24, 2016. On March 24, 2016, you shipped one, 55-gallon drum of D001 hazardous waste, weighing 500 pounds. At the time of the inspection you had accumulated 24, 55-gallon containers of spent solvent to be distilled. Subsequent to the inspection, you marked at least one of these containers with an accumulation start date of March 21, 2016. Please provide the following additional information regarding the spent solvent and the 24 accumulated containers present at the time of the inspection.
  - a. Please provide the accumulation start dates for each of the 24 containers of hazardous waste that were on-site at the time of the inspection.
  - b. Please provide copies of all manifests that document disposal of any of these 24 containers. Alternatively, provide a copy of a log or other record that documents when the contents of the 24 containers were recycled. Please state whether any containers remain on site (and how many) with a description of the planned disposition of these containers.
  - c. In your June 10, 2016, response to the inspector, you estimated that you currently generate three, 55-gallon containers of spent solvent each month. However, it appears that between March 21, 2016, and the inspection (which is an eight-week time-frame) you generated more than 24, 55-gallon containers of spent solvent. At that generation rate, you are currently generating about three, 55-gallon containers of spent solvent per week, or about twelve, 55-gallon containers per month. Please explain the discrepancy between your estimate in the June 10, 2016, response, and the estimate explained above. Include in your response a more accurate estimate of the amount of spent solvent generated per month.
  - d. Please provide the capacity of your distillation unit(s), and the duration of one distillation cycle. Please also provide an estimate of the number of times that your distillation unit is run each week.

- e. Please provide copies of all records regarding spent solvent distillation for the last three years (May 2013 to the present). If you have not maintained records, please state so and provide an estimate of how much spent solvent you recycle per month. Remember that all spent solvent (even previously recycled solvent) must be counted the first time it is recycled in a calendar month. Both the Kansas Department of Health and Environment and the Nebraska Department of Environmental Quality have guidance documents that may assist you with understanding the counting requirements:
    - KDHE, "Determining the Hazardous Waste Generation Rate for On-Site Solvent Recycling" (HW-2011-G3), [http://www.kdheks.gov/waste/p\\_techguides.html](http://www.kdheks.gov/waste/p_techguides.html)
    - NDEQ, "Solvent Stills and Hazardous Waste "Counting"", [http://deq.ne.gov/Publica.nsf/Pubs\\_RCRA.xsp](http://deq.ne.gov/Publica.nsf/Pubs_RCRA.xsp)
  - f. If the distillation unit has been fixed or replaced, please provide copies of documentation that shows when it went back into operation and/or when a new unit became operational.
4. Please provide legible copies of your hazardous waste manifests for the last three years (May 2013 to the present).
  5. Please provide copies of the pages of your Employee Handbook (effective at the time of the May 2016 inspection) regarding hazardous waste management.
  6. Please provide copies of the Employee Orientation training (effective at the time of the May 2016 inspection) regarding hazardous waste management.

### 3007 RESPONSE INSTRUCTIONS

- Identify the Person(s) responding to this request on your behalf.
- Address each numbered item separately, and precede each answer with the number of the item to which it responds.
- For each numbered item, identify all documents consulted, examined, or referred to in the preparation of the answer, or that contain information responsive to the requested item. Provide true, accurate, and legible copies of all such documents. (If information responsive to an item is available but there are no relevant source documents, you must still provide the information.)
- For each document provided, indicate on the document (or in some similar manner) the number of the item to which it responds.
- For each numbered item, identify all persons consulted in the preparation of the answer.
- For purposes of this request, the term “you” or “your” refers to the company, corporation and any officer, principal, agent employee, or any other person(s) associated in any capacity.
- If information responsive to a requested item is not in your possession, identify the person(s) from whom the information may be obtained.
- If information that is not known or available at the time you make your response later becomes known or available to you, you must supplement your response.
- If, at any time after you submit your response, you find that any part of the information you submitted is incomplete, false, or misrepresents the truth, you must notify the EPA immediately.
- You must provide the requested information even though you consider it confidential information or trade secrets. If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as “trade secret,” “proprietary,” or “company confidential.”
- The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.
- A request for an extension to the time limit for responding must be in writing and must be postmarked within five (5) calendar days of receipt of this information request. Address it to the person identified in the cover letter to receive your response.
- Copies of the Code of Federal Regulations may be obtained from the U.S. Government Bookstores or on the Internet at [www.epa.gov/epahome/cfr40.htm](http://www.epa.gov/epahome/cfr40.htm).
- This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980.
- The EPA encourages you to conserve resources. Suggested methods include use of recycled paper, printing on both sides (duplex printing), and when possible submitting documents electronically (i.e., email or compact discs). If hard copy submittals are necessary, please do not submit documents in binders.

Not responding to this information request within the stated time limit and in accordance with these instructions may subject your facility to an enforcement action which could include the imposition of penalties assessed per violation, per day of continued noncompliance. Providing false, fictitious, or fraudulent statements or representations could lead to criminal penalties.

